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Peter Bauer
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April 8, 2025

Ariel Lynch
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook NY 12977

Re: Application by Verizon Wireless for 120-foot telecommunications tower
(Town of Ellenburg); APA Project No. 2023-0193

Dear Ms. Lynch:

Protect the Adirondacks (PROTECT) offers these comments for your consideration regarding the application by Verizon Wireless (Verizon) for a 120-foot-tall telecommunications tower to be located on Smith Road in the Town of Ellenburg in Clinton County. The proposed location for the tower is on lands classified Resource Management, the most protective private land classification in the Adirondack Park.

PROTECT opposes approval of Verizon's application for the tower as proposed because the it will not be "substantially invisible" as required by the Adirondack Park Agency Act (APA Act) and the Agency's Policy on Agency Review of Proposals for New Telecommunications Towers and Other Tall Structures in the Adirondack Park" (Towers Policy). The APA Act requires that a new tower in the Adirondack Park must not have an "undue adverse impact upon the natural, scenic, aesthetic . . . or open spaces resources of the park." Executive Law § 809[10]). In addition, the Towers Policy (pages 3 to 4) specifies that a proposed telecommunications tower must be "substantially invisible". Therefore, in order to be approved by the APA, a proposed tower must incorporate design elements that ensure that it will be "substantially invisible".

Verizon's visual simulations make clear that the proposed 120-foot "monopole" tower will not be "substantially invisible." Verizon's Visual Resource Evaluation shows that the proposed monopole will be visible from locations on Smith Road. The facility is clearly visible at the site of the access road on Smith Road. In addition, Verizon's evaluation lacks any analysis of the proposed tower's visual and aesthetic impacts on the nearby public use areas in the Chazy Highlands Wild Forest, including Ellenburg Mountain, and Lyon Mountain.

Protect the Adirondacks

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In particular, the Lyon Mountain fire tower is a popular hiking destination that “is the highest point in Clinton County and the highest point north of the Saranac River at 3,830 feet”¹. Verizon’s failure to address the proposed tower’s visual and aesthetic impacts on these public use areas as required by the APA’s Visual Analysis Methodology is a serious deficiency in the current application.

Moreover, the proposed 120’ monopole tower will be located in an area with mature trees and will not “blend with the background vegetation” as required by the Towers Policy (page 3). The trees surrounding the proposed tower site are 60 to 70 feet tall, so Verizon’s 120-foot tower will loom 50 to 60 feet above the height of the tallest nearby trees. The proposed tower design does not include any measures to conceal or camouflage the structure itself to make it “substantially invisible” (e.g., “monopine” or other design features to make the tower blend in with the surrounding trees).

For the above reasons, Verizon’s application fails to adequately address the visual and aesthetic impacts of its proposed tower and the application makes clear that the proposed tower as currently designed will have an undue adverse impact on the natural, scenic, aesthetic and open spaces resources of the Adirondack Park. The application must therefore be denied, or the proposed tower height and design modified to comply with the criteria in the APA Act and the Tower Policy. Notably, the applicant had originally proposed a 100 foot tall tower.

In the event that the tower height and design are modified by the applicant to comply with the criteria in the APA Act and in the Towers Policy, the permit should include a condition explicitly prohibiting the cutting of the existing trees around the tower site because they will provide essential screening of the tower and the applicant is relying on the continued existence of the surrounding trees as its plan for vegetative screening. Moreover, there should be a condition requiring the planting of new trees in the event that any existing trees are destroyed, such as by storm or disease.

On behalf of the Board of Directors of Protect the Adirondacks, we thank you for considering our comments regarding this application.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Claudia K. Braymer,
Executive Director

¹ <https://dec.ny.gov/places/chazy-highlands-wild-forest>